

# **EXHIBIT 25**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL )  
5 PRESCRIPTION ) MDL No. 2804  
6 OPIATE LITIGATION )  
7 \_\_\_\_\_ ) Case No.  
8 ) 1:17-MD-2804  
9 )  
10 THIS DOCUMENT RELATES ) Hon. Dan A.  
11 TO ALL CASES ) Polster  
12 )

13 WEDNESDAY, APRIL 24, 2019

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Anna  
18 Lembke, M.D., held at the offices of Lief  
19 Cabraser Heimann & Bernstein, LLP, 275  
20 Battery Street, 29th floor, San Francisco,  
21 California, commencing at 8:07 a.m., on the  
22 above date, before Carrie A. Campbell,  
23 Registered Diplomate Reporter and Certified  
24 Realtime Reporter.

25 - - -

26 GOLKOW LITIGATION SERVICES  
27 877.370.3377 ph | 917.591.5672 fax  
28 deps@golkow.com

1 would hold yourself out as a psychiatrist as  
2 opposed to a pain management physician or an  
3 anesthesiologist?

4 MR. ARBITBLIT: Object to form.

5 THE WITNESS: I would disagree  
6 with that statement because I do hold  
7 myself out as having expertise in the  
8 field of pain management, but not  
9 anesthesiology, per se.

10 QUESTIONS BY MR. TSAI:

11 Q. How many hours have you spent  
12 treating patients in palliative care, for  
13 example, for their individual pain needs?

14 A. I have not worked in a  
15 palliative care setting.

16 Q. How many patients have you  
17 diagnosed with chronic pain as another  
18 example?

19 A. I have diagnosed many patients  
20 with chronic pain over the years. I've been  
21 in practice for more than 20 years, seen  
22 approximately 40,000 patients over my career.  
23 I couldn't tell the exact number that I've  
24 diagnosed with chronic pain, but if I had to  
25 put a ballpark estimate, I would say

1 something on the order of 50 percent of my  
2 patients have some kind of chronic pain  
3 diagnosis.

4 Q. What is the total number of  
5 patients you've treated for their individual  
6 pain needs as opposed to addiction associated  
7 with surgeries or cancer?

8 MR. ARBITBLIT: Object to form.

9 THE WITNESS: It's difficulty  
10 for me to put an exact number on that.  
11 The majority of patients that I treat  
12 for their pain needs also have some  
13 sort of co-occurring mental health  
14 disorder, but pain is a priority in  
15 the overall treatment plan of those  
16 patients.

17 QUESTIONS BY MR. TSAI:

18 Q. So just to be clear, in your  
19 practice, you engage in primary diagnoses of  
20 patients who are complaining of pain and  
21 deciding how to treat their pain needs?

22 MR. ARBITBLIT: Objection.

23 THE WITNESS: Yes.

24 QUESTIONS BY MR. TSAI:

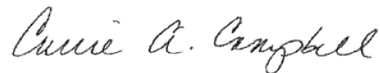
25 Q. What is the total number of

CERTIFICATE

I, CARRIE A. CAMPBELL, Registered  
Diplomate Reporter, Certified Realtime  
Reporter and Certified Shorthand Reporter, do  
hereby certify that prior to the commencement  
of the examination, Anna Lembke, M.D., was  
duly sworn by me to testify to the truth, the  
whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the  
foregoing is a verbatim transcript of the  
testimony as taken stenographically by and  
before me at the time, place and on the date  
hereinbefore set forth, to the best of my  
ability.

I DO FURTHER CERTIFY that I am  
neither a relative nor employee nor attorney  
nor counsel of any of the parties to this  
action, and that I am neither a relative nor  
employee of such attorney or counsel, and  
that I am not financially interested in the  
action.



CARRIE A. CAMPBELL,  
NCRA Registered Diplomate Reporter  
Certified Realtime Reporter  
Notary Public  
Dated: April 29, 2019